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*Managed Business Services, Inc.*

9  
10 **THE UNITED STATES DISTRICT COURT**  
11 **FOR THE DISTRICT OF NEVADA**

12 MARIA LIENAU, an individual,  
13  
Plaintiff,

14 v.

15 NEVADA GAMING PARTNERS, LLC, a  
domestic limited-liability company;  
16 NEVADA GAMING PARTNERS  
MANAGEMENT, LLC, a domestic limited-  
liability company; NEVADA GAMING  
17 PARTNERS MANAGEMENT II, LLC, a  
domestic limited-liability company;  
18 MANAGED BUSINESS SERVICES, INC., a  
domestic corporation; EMPLOYEE(S)/  
19 AGENT(S) DOES 1-10; and ROE  
CORPORATIONS 11-20, inclusive,  
20

21 Defendants.

**CASE NO.: 2:16-cv-01818-RFB-NJK**

**STIPULATED DISCOVERY PLAN AND  
SCHEDULING ORDER**

22 Under Federal Rule of Civil Procedure 26(f) and Local Rule 26-1, Plaintiff Maria Lienau  
23 (“Ms. Lienau” or “Plaintiff”) and Defendant’s Nevada Gaming Partners, LLC, Nevada Gaming  
24 Partners Management, LLC, Nevada Gaming Partners Management II, LLC and Managed Business  
25 Services (“Defendants”), submit the following Stipulated Discovery Plan and Scheduling Order.

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**1. Fed. R. Civ. P. 26(f) Meeting**

On August 31, 2016, counsel conferred and discussed the matters required by Federal Rules of Civil Procedure 26(f) and Local Rule 26-1.

**2. Initial Disclosures**

The parties agree, pursuant to Local Rule 26-1, that the parties will exchange their respective initial disclosures by Wednesday, September 14, 2016, which is within 14 days of the date of the initial 26(f) conference, and that there should be no changes to the initial disclosure requirements under Fed. R. Civ. P. 26(a)(1).

**3. The Subjects On Which Discovery Will Be Conducted**

The parties will conduct discovery on all issues raised in the Complaint and Answer.

**4. Electronically Stored Information**

The parties are in the process of conferring regarding ESI, including any methods for the disclosure of ESI. The parties will continue to discuss ESI as necessary and will, if necessary, present the Court a form of production order, request a conference with the Court, or present an appropriate Motion regarding such issues under Rule 26.

**5. Claims of Privilege or Protection**

At this time, the parties do not anticipate any issues regarding claims of privilege or protection, but reserve the right to assert any such claims. The parties will work to an agreement on an appropriate clawback provision for inadvertently produced information protected by the attorney-client privilege. The parties will work together to include the clawback provision in a Proposed Confidentiality Agreement and Stipulation for Entry of a Qualified Protective Order that the parties will be filing with the Court if the parties are in agreement on such matters.

**6. Limitations On Discovery**

The parties agree that discovery will be conducted in accordance with the Federal Rules of Civil Procedure and applicable Local Rules without limitation or modification of the same.

**7. Any Other Orders the Court Should Issue**

None at this time.

**8. Discovery Deadline**

Defendants removed this matter on July 29, 2016, and filed their motion to dismiss on August 10, 2016. The parties request that Discovery shall close on Monday, February 6, 2017, which is one-hundred-eighty (180) days from the date of the filing of Defendants' Motion to Dismiss.

**9. Amending the Pleadings and Adding Parties**

The deadline to file motions to amend the pleadings or add parties shall be Tuesday, November 8, 2016, ninety (90) days prior to the close of discovery.

**10. Expert Disclosures**

In accordance with Fed. R. Civ. P. 26 (a)(2), disclosures identifying initial experts shall be made sixty (60) days prior to the discovery cut-off date and no later than Thursday, December 8, 2016. Disclosures identifying rebuttal experts shall be made thirty (30) days after the initial expert disclosure and no later than Friday, January 5, 2017.

**11. Dispositive Motions**

The filing deadline for dispositive motions shall be Wednesday, March 8, 2017, thirty (30) days after the close of discovery.

**12. Motions in Limine/Daubert Motions**

Under LR 16-3(a), any motions in limine, including *Daubert*-type motions, shall be filed and served thirty (30) days prior to the commencement of trial, and oppositions shall be filed and served fourteen (14) days thereafter. Reply briefs will only be allowed with leave of the Court.

**13. Pretrial Order**

Pursuant to LR 26-1(b)(5) the Joint Pretrial Order shall be filed by Friday, April 7, 2017, which is thirty (30) days after the date set for the filing of dispositive motions (Wednesday, March 8, 2017). In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until the Court issues its decision on any dispositive motions or further order of the Court. The disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections shall be included

in the final pretrial order, and must be filed at least 30 days prior to trial in accordance with FRCP 26(a)(3)(B).

#### 14. Interim Status Report

In accordance with LR 26-3, the parties shall file the interim status report by Friday, April 7, 2017, sixty (60) days before the discovery cut-off.

#### 15. Certifications

(a) The parties certify that they met and conferred regarding the possibility of settlement and using alternative dispute-resolution processes and that they will participate in the Court's early neutral evaluation process in an attempt to settle this matter.

(b) The parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and use of the short trial program. The parties do not so consent at this time.

RESPECTFULLY SUBMITTED.

DATED this 2nd day of September, 2016

<p>HOLLAND &amp; HART LLP</p> <p><u>/s/ R. Calder Huntington</u>  Dora V. Lane  Nevada Bar No. 8424  R. Calder Huntington, Esq.  Nevada Bar No. 11996  9555 Hillwood Drive, 2nd Floor  Las Vegas, NV 89134</p> <p><i>Attorneys For Defendants,  Nevada Gaming Partners, LLC,  Nevada Gaming Partners Management, LLC,  Nevada Gaming Partners Management II, LLC  and Managed Business Services, Inc.</i></p>	<p>GABROY LAW OFFICES</p> <p><u>/s/ Christian Gabroy</u>  Christian Gabroy, Esq.  Oscar Peralta, Esq.  The District at Green Valley Ranch  170 South Green Valley Parkway, Ste. 280  Henderson, NV 89012</p> <p><i>Attorneys for Plaintiff,  Maria Lienau</i></p>
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**IT IS SO ORDERED.**

DATED this \_\_\_\_ day of \_\_\_\_\_, 2016.

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UNITED STATES MAGISTRATE JUDGE

HOLLAND & HART LLP  
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Las Vegas, NV 89134